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Robert K. Malone, Esq.

Brett S. Theisen, Esq.

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	(Hon. Martin Glenn)
	:	
	:	Chapter 11
<b>OLD CARCO LLC, <i>et al.</i></b>	:	
<b>(f/k/a Chrysler LLC),</b>	:	Case No. 09-50002 (MG)
	:	
Debtors.	:	(Jointly Administered)

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**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF ALL NOTICES AND DOCUMENTS**

**PLEASE TAKE NOTICE** that Gibbons P.C. (“Gibbons”), hereby appears as counsel in the above-captioned case for FCA US LLC (“FCA US”), the purchaser of certain assets of Old Carco LLC (f/k/a Chrysler LLC) (“Old Carco”), the above-captioned debtors (the “Debtors”).

**PLEASE TAKE FURTHER NOTICE** that pursuant to section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Federal Rules of Bankruptcy Procedure 2002, 9007 and 9010 (the “Bankruptcy Rules”), it is hereby requested that all notices given or required to be given and all papers served or required to be served in this case be given to and served on the following:

**GIBBONS P.C.**

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(973) 596-4500  
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Robert K. Malone, Esq.  
[rmalone@gibbonslaw.com](mailto:rmalone@gibbonslaw.com)  
(973) 596-4533 (direct)

- and -

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**PLEASE TAKE FURTHER NOTICE** that this request includes not only the notices and papers referred to in the Bankruptcy Code and Rules specified above, but also includes, without limitation, all orders and notices of any application, motion, petition, pleading, request, complaint or demand, statement of affairs, operating reports, schedule of assets and liabilities, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, electronic mail, facsimile transmission, or otherwise that (1) affects or seeks to affect in any way any rights or interest of any creditor or party-in-interest in this case, including FCA US with respect to (a) the Debtor, (b) property of the Debtor's estates, or proceeds thereof, in which the Debtor may claim an interest, or (c) property or proceeds thereof in the possession, custody or control of others that any of the Debtor may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment or other conduct by any of the Notice Parties.

**PLEASE TAKE FURTHER NOTICE** that FCA US intends that neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive (1) the right of FCA US to

have final orders in non-core matters entered only after de novo review by the United States District Court for the Southern District of New York (the “District Court”); (2) the right of FCA US to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (3) the right of FCA US to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which FCA US is or may be entitled under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, or recoupments FCA US hereby expressly reserves.

Dated: November 19, 2021

**GIBBONS P.C.**  
Attorneys for FCA US LLC

By: /s/ Robert K. Malone  
Robert K. Malone  
Brett S. Theisen  
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**CERTIFICATION OF MAILING**

I hereby certify that on November 19, 2021, a true and correct copy of the foregoing Notice of Appearance was served electronically through the Court's CMS/ECF System on parties formally requesting electronic service and by first-class mail postage pre-paid to the following persons at the following addresses:

Vito Genna, Clerk  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, New York 10004-1408

Hon. William K. Harrington  
United States Trustee, Region Two  
U.S. Federal Office Building  
201 Varick Street, Room 1006  
New York, New York 10014  
Attn: Andrew D. Velez-Rivera, Esq.

Peter D'Apice, Esq.  
Sander Esserman, Esq.  
Stutzman, Bromberg, Esserman & Plifka, P.C.  
2323 Bryan Street  
Suite 2200  
Dallas, Texas 75201-2689

/s/ Robert K. Malone

Dated: November 19, 2021  
Newark, New Jersey